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9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 JEFFREY JEROME BLAN,

13
14 Petitioner,

15 v.

16 M.C. KRAMER, Warden,

17 Respondent.

C 07-5781 CRB (PR)

**DECLARATION OF COUNSEL IN
SUPPORT OF APPLICATION FOR
ENLARGEMENT OF TIME TO
FILE ANSWER TO PETITION**

18 I, LISA ASHLEY OTT, declare under penalty of perjury as follows:

19 I am the California Deputy Attorney General assigned to represent respondent in this case.
20 Respondent's answer is due April 12, 2008, per this Court's Order To Show Cause, filed on
21 February 12, 2008.

22 Following a jury trial in Santa Cruz County Superior Court, petitioner was convicted of
23 first degree burglary and petty theft with a prior. The court sentenced petitioner to 7 years in state
24 prison.

25 I request an additional sixty days to answer because my existing backlog has prevented
26 me from turning my attention to this case. Specifically, this Court issued its Order To Show Cause,
27 I have filed respondent's briefs in the California Court of Appeal in *People v. McFarland*
28 (H030824), and *People v. Castenada* (A118550). I have also filed a respondent's brief in the Ninth

1 Circuit in *Watson v. Carey* (No. 07-17039). Finally, I am currently working to complete a
2 respondent's brief in *People v. Yang* (H030936), a murder case with a lengthy record which includes
3 both a guilt and sanity phase. In each of these cases, the opening brief or petition was filed before
4 this Court's order setting the briefing schedule in this case.

5 In addition, I was out of the office on a pre-planned vacation from February 29 through
6 March 4, 2008.

7 Accordingly, I request that the Court grant respondent to and including June 11, 2008, in
8 which to file its answer or other response to the petition.

9 I declare under penalty of perjury of the laws of the State of California and the United
10 States of America that the foregoing is true and correct. Executed at San Francisco, California on
11 April 10, 2008.

12
13 /s/ **Lisa Ashley Ott**

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LISA ASHLEY OTT
Deputy Attorney General
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